

**USDA Child Nutrition Programs
Administrative Review Summary Report**

School Food Authority: Grafton School District

Agency Code: 45-2217

School(s) Reviewed: Woodview Elementary (lunch) John Long Middle School (breakfast)

Review Date(s): 1/10 – 1/12/17

Date of Exit Conference: 1/12/17

State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

General Program Reminders/Updates:

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training.
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills.
- SFAs are required to have a local meal charge policy in place no later than July 1, 2017. More information, resources, and best practices may be found on the Wisconsin DPI School Nutrition Financial Management webpage dpi.wi.gov/school-nutrition/national-school-lunch-program/financial, scroll down to the unpaid meal charges section.

Appreciation/Commendations/Noteworthy Initiatives:

Thank you to the staff at Grafton School District for the courtesies extended to us during the on-site review. Thank you to the Food Service Director, the Determining Official, Administrative Staff, and Food Service Staff for being available when answering questions and providing additional information when necessary. The Food Service Director and Determining Official were very receptive to recommendations and guidance. In addition, thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

REVIEW AREAS

1. MEAL ACCESS AND REIMBURSEMENT

Commendations

1. The December lunch and breakfast claim was validated and consolidated correctly.
2. The free and reduced applications were well documented by the Determining Official and explicitly listed any income including calculations to determine the benefit status.
3. Direct Certification was run multiple times through the first half of the school year.
4. All DPI templates were used for regarding Free and Reduced Meal Applications, Verification, and Direct Certification.
5. Verification was done completely and well documented. It was started on October 1 and finished on November 11. The Verification Collection Report was submitted in December.

Technical Assistance and Program Requirement Reminders

1. Per page 51 of the Eligibility Manual, if a household has the same pay frequency listed on the application for multiple income sources, there is no requirement to annualize the income.
2. As a reminder, it is unallowable to extend benefits to the rest of the household when a student has been matched on Direct Certification with an E code (foster).

Findings and Corrective Action Needed

☐ **Finding #1:** The total price of a breakfast was viewable on the point of sale system. Overt Identification is unallowable.

Corrective Action Needed:

- Work with Skyward to remove this feature, use a privacy screen, or cover up the total using a post it note.
- This was completed on-site. No further action required.

2. MEAL PATTERN AND NUTRITIONAL QUALITY

Commendations and Appreciations

Sincere thanks to the Food Service Director and Bookkeeper of the Grafton School District and to the school nutrition professionals at Woodview Elementary, Grafton Elementary, and John Long Middle School. We appreciate your time and efforts spent preparing for and participating in the on-site review. The operations were welcoming, and staff looked professional in their uniforms. Customer service was excellent, and students were greeted by friendly, smiling faces.

Technical Assistance and Program Requirement Reminders

Offer Versus Serve

Kitchen staff members were somewhat unclear about the Offer Versus Serve (OVS) requirements for lunch. Although all students observed took a reimbursable meal, staff must fully understand the OVS requirements. At lunch, students who declined the entrée, cheese pizza roll crunchers, were given more lettuce, cucumbers, and/or apple slices than students who selected the entrée. The entrée credits as meat/meat alternate and grain, while the lettuce and cucumbers credit as vegetables and the apple slices credit as fruit. Serving additional vegetables and fruits when a student declines the entrée, as substitutes for meat/meat alternate and grain, is unnecessary. Portion sizes should be consistent with the planned menu. Inconsistent portion sizes may lead to decreases in customer satisfaction, as those who receive smaller portions feel less valued. Furthermore, inconsistent portioning makes it more difficult for students to learn good eating habits and for staff to identify full components and reimbursable meals. Students must take three of five required components; they may decline the meat/meat alternate and grain components when selecting a reimbursable meal.

Overall, staff did a fine job helping the students select reimbursable meals. They often encouraged selection of fruits and vegetables. However, at times fruits and vegetables were misconstrued as less substantial than the entrée or cookie. Be mindful of language that misrepresents fruits and vegetables, which are as equally important to a reimbursable meal as the meat/meat alternate and grain components.

Production Records

The breakfast and lunch production record templates currently in use are missing required information. While there is no required template, there are examples on our website:

<http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>.

Current templates must be updated to include the following required information for continued use:

Breakfast

- Planned portion sizes for each grade group and adults
- Planned number of portions
- Total number of purchase units prepared
- Milk types

Lunch

- Total number of portions prepared and number of portions leftover
- Milk types

Corrective Action

Finding: Current production records do not include all required information.

Required Corrective Action: Update the breakfast production record to include the following missing information: planned portion sizes for each grade group and adults, planned number of portions, total number of purchase units prepared, and milk types.

Update the lunch production record to include the following missing information: total number of portions prepared and number of portions leftover and milk types.

Please submit one full day of completed production records, updated to reflect these requirements.

3. RESOURCE MANAGEMENT

Commendations

The 16-17 Paid Lunch Equity Tool was well done. The 17-18 PLE tool will be released within the next month and available for use.

Comments/Technical Assistance/Compliance Reminders

1. The Resource Management Risk Assessment Tool was completed with 1 flag. A comprehensive review of non-program foods was required.
2. Grafton School District has a Negative Account Balance Policy and it was reviewed. It is advised to add a statement regarding students with negative accounts be allowed to purchase a meal if they brought money to school. They cannot be turned away from purchasing a meal.

In case it will be revised, here is some guidance:

USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf> . For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>

- Best Practices
- Local meal charge policy checklist
- Sample outstanding balance letter
- Sample robo-call script

4. GENERAL PROGRAM COMPLIANCE

Commendations

1. The And Justice For All poster and the most recent food safety inspection is posted in a prominent public location for all to see.
2. The Food Safety plan was well done and had all of the required components.
3. The first Food Safety Inspection was completed in October and the next inspection will be after the New Year sometime.
4. On-site monitoring forms for the sites reviewed were completed prior to February 1 and well documented. The rest of the sites will have to be monitored prior to February 1.
5. Professional Standards is being well documented for all employees. The Food Service Director keeps an Excel spreadsheet of all information regarding the trainings each staff member has completed.

Comments/Technical Assistance/Compliance Reminders

1. Signs in the cafeteria stated there was a “peanut free zone” or a “nut free zone”. Technical assistance was provided to change the wording on the signs to “peanut aware zone” instead.

5. OTHER FEDERAL PROGRAMS REVIEWS

Comments/Technical Assistance/Compliance Reminders

1. This is a reminder that the regulations require that the SFA inform eligible families before the end of the school year of availability and location(s) of any Summer Food Service Programs located in the geographic area of the SFA. Information on this can be found on our website at <http://dpi.wi.gov/community-nutrition/sfsp>. There is a link at the bottom of the page that shows a map of all the places in the area offering the Summer Food Service Program. Families can also call 211 to get accurate dates and time of locations operating the Summer Food Service Program.
2. The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

The Wellness Policy should include:

- a. Specific measurable goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- b. Nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- c. At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process.
- d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies on school website, social media, newspaper, or newsletters.
- e. Document public involvement, public updates, policy leadership, and evaluation plan.
- f. SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy.
- g. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis. Some methods of notification include mailing flyers, newsletters, emails, website postings, and newspaper articles.

A summary of the requirements can be found at:

https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalr

[ule.pdf](#). USDA Food and Nutrition Service has information on the local school wellness policy process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage dpi.wi.gov/statesupt/agenda-2017.

